Joseph A. Grob (JAG 7975) Goldberg & Rimberg, PLLC 115 Broadway New York, New York 10006 (212) 697-3250

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

NOTICE OF MOTION

09-CR-00033 (LBS)

-V-

JONATHAN CURSHEN,

Defendant.

PLEASE TAKE NOTICE, that upon the annexed declarations of Jonathan Curshen and Joseph A. Grob, Esq., the exhibits annexed hereto, and the accompanying memorandum of law and all of the prior proceedings having already been held herein, the defendant, Jonathan Curshen, shall move this Court located at the United States District Courthouse, 500 Pearl Street, New York, New York 10007, on a day to be determined by the Court, for an order vacating his previously entered plea of guilty and setting this matter down for trial

Dated: New York, New York February 14, 2011

Yours, etc.,

GOLDFIRG & RIMBERG PLLC

By:

Joseph A. Grob

Attorneys for

Jonathan Curshen

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New York, New York 10006

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TO: AUSA Avi Weitzman
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